

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FILED
U.S. BANKRUPTCY COURT

NOTICE OF STAY APPLICATION

MAY 27 10:40

INDEX NOS 25-CV-04105 (KMK)

S.D. OF N.Y.

24-CV-07284 (KMK)

IN RE RAHUL MANCHANDA, AND
MANCHANDA LAW OFFICE PLLC,

BANKRUPTCY CASE INDEX NOS 23-22095
23-11805

BANKRUPTCY ADV. PROC NOS 23-07008
24-07009
24-07010

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In accordance with the Notice of Election of Appeal on SDNY Bankruptcy Judge Sean Lane's Unconstitutional Order Denying Requests for Contempt And/Or Sanctions And Enjoining Filings By Debtor dated May 12, 2025, attached herein, Debtor files the instant Notice of Stay Application per Rule 8007 and states as follows:

How Deep State Oligarch-Placed Judges Deny The Constitution To Dissenters

1. It is quite obvious to the vast majority of Americans that the global Oligarchs, Plutocrats, and Bankers absolutely detest the masses, especially the American voters, who have powers and inalienable rights guaranteed to them by the United States Constitution, a document that is noticeably absent in the vast majority of the world's governments, leaving those people vulnerable to arbitrary and capricious genocide, murder, family separation, suppression, starvation, detention, incarceration, torture, surveillance, property seizure, and a whole host of other transgressions to liberty that the American Founding Fathers fought to protect and preserve in their Bill of Rights and Declaration of Independence from the already incestuous, stifling, and suffocating Monarchial world of Old Europe, wherein the vestiges and badges of slavery and peasantry still hung thick in the air like a fog.
2. So, when outright warfare did not work to re-take the Americas, the European money changers, bankers, plutocrats, monarchs, and oligarchs resorted to subterfuge and clandestine methods to seize back the human and property capital, such as launching secret societies based out of Europe, bribery of America's politicians, legislators, executive, and lately, which was one of the toughest nuts to crack, the American judiciary.
3. In the global oligarchy's experience, warfare was the easiest method to subvert the nation of America, but the judiciary was still unfortunately staffed with intellectuals, idealists, oaths, ethics, and

a deeper understanding of the written constitution and the rights contained therein.

4. However, just as these Deep State oligarchs were able to successfully remove any and all rights, liberties, freedoms, and constitutional guarantees from the People by declaring them to be "terrorists," or "enemy combatants," particularly after the events of September 11, 2001, so too did they turn their sights on Americans (or anyone) who ran afoul of their multiple global agendas, within the state and federal courts, by terming and calling these problematic and troublesome "freedom fighters" such names as "vexatious litigators," "racists," "offensive," "anti-semitic," "homophobic," or any other type of vile repulsive appellation which would then immediately give that Deep State evil judge the right and ability to quickly shut down that freedom fighter court litigant, through such methods as removing appeal or notice rights, summary judgment without receiving an answer or case merits analysis, pre-answer *sua sponte* (on the court's own volition) dismissal, and filing injunctions requiring a litigant to literally first beg the court to even file a case to defend themselves, their family, their children, their business, or ability earn a living.
5. These cruel guillotine-like legal maneuvers have proven to be extremely effective in quickly smiting down any and all legitimate, real, and justiciable cases and controversies before they could even see the light of day, reach the public's attention, or at most, change the system by fighting back against the tyranny being foisted upon them by the global oligarchy, in the person of a state or federal judge, instead of a Deep State soldier or gunman blowing the upstart's brains out with an automatic weapon.
6. This type of quick dispatch is also known as a "soft kill," or part of the system perfected by the European STASI as "Zersetzung," or "decomposition" of the targeted litigant.
7. The STASI was the inheritor of the collective wisdom on dissident or citizenry suppression by the former Soviet Union's NKVD, KGB, FSB, NAZI Germany's Gestapo or Schutzstaffel ("SS"), and scores of other secret police mechanisms which truly reared their ugly head during World War II, and which were the inspirations for the American CIA, Department of Homeland Security, and Federal Bureau of Investigation.
8. A Judge branding someone a "vexatious litigant" automatically destroys the target's credibility, reputation, standing, respect, and even the media stays away from covering the case, thereby preventing the case or controversy, or issues being litigated, from even reaching public opinion.
9. In other words, gross and severe violations of inalienable human rights, defense of family, children, and right to earn a living are quickly snuffed out, like a candle, never to be seen or heard from

again.

10. Famous judges that have recently been in the news, targeting certain individuals for fighting for their civil liberties, human rights, constitutional rights include such judicial tyrants, whether fascist (right wing) or communist (left wing) always serving the Oligarchy, include Southern District of New York Bankruptcy Judge Sean Lane, Southern District of New York Senior Judge Naomi Reice Buchwald, U.S. Court of Appeals Second Circuit Judges Alison Nathan, Raymond Lohier, New York State Supreme Court Appellate Division Chief Judge Dianne Renwick, and countless others.
11. It is no accident that the vast majority of these criminal Deep State judges and traitors to the United States Constitution call their home, New York, which is also officially called the "Empire State," in homage to a quick slip of the tongue by George Washington in 1785, who clearly detested the concept of Empire, since he repeatedly and steadfastly refused the titles of "King" or "Emperor" after he was victorious in defeating the British King George III, opting instead for the title of "President" with a term of only 4 years at a time.
12. Perhaps someone needs to send these evil judges a copy of the United States Constitution, and remind them that the United States of America is not an "Empire," but rather, a Constitutional Republic ("if you can keep it," as per Benjamin Franklin in 1787).

Specific Responses To Judge Sean Lane's Memorandum and Order Dated 5/12/25

13. In contrast to Judge Sean Lane's sweeping, simplistic waving away of all of Debtor's contempt motions as "without basis in law or fact," even though each and every motion was replete with not only law and fact, but also documentary evidence substantiating the same, usually preceded by frantic requests to the Trustees to intervene or communicate with the contemnor so that Debtor would not have to (Judge Sean Lane's previous Order) - which of course, the documentary evidence shows that the Trustees routinely ignored, even when cc'ed to his Court Deputy, Liza Ebanks Holley, usually under emergency circumstances court cases in the next few days.
14. Even worse, this tyrant Judge Sean Lane began to threaten Debtor with "sanctions" should he "transgress" those vague, illusory, and unclear boundaries, including a filing ban.
15. This dog-whistle was heard loud and clear by Debtor's opponents, enemies, and various criminals who then smelled blood in the water, and began to file attack after attack against Debtor, ostensibly violating the automatic stay per 111 U.S.C. § 362, with Debtor providing documentary proof, but of course, neither the trustees nor Judge Sean Lane would do anything.

16. The "flurry of contempt motions" did not reflect on Debtor, but rather on the increase in attacks brought on by Judge Sean Lane's lax (and encouraging) behavior to attackers when he refused to chastise in the slightest, those wilful violators and active contemnors for their illegal and unethical behavior, emboldening and encouraging them in the hopes that Judge Sean Lane would eventually sanction the Debtor.
17. Judge Lane then goes on to quote other unethical and tyrannical jurists over Debtor's past 25 successful attorney career as a small business law firm owner, having had 100s of employees and attorneys working for him, using his own Ivy League law clerks to pick and choose which case pleading snippets to use, finding proverbial needles in a haystack, to justify his outcome-determinative desire to gag and bind Debtor so that he and his tyrannical judicial ilk could further punish and remove any and all remaining civil liberties, human rights, and constitutional guarantees as he could.
18. It should be noted that each and every case that Judge Sean Lane mentions is currently being appealed in the SDNY case 25-CV-3935.
19. Judge Sean Lane next complains that the next hearing dates were not consulted with by the court, instead choosing the next judicially set court dates, neglecting that his court routinely never returned Debtor's emails and phone calls due also to Judge Sean Lane's earlier unhinged, red-faced, and Caligula-like screams that Debtor not communicate with his court, otherwise face sanctions.
20. In the same dictatorial fashion, Judge Sean Lane then insults and mocks Debtor for falling sick with severe COVID backed up with a written medical diagnosis, which is even more dangerous given Debtor's cardiovascular heart disease and survival of a heart attack in August 2019, characterizing it as some sort of "childhood truancy" rather than the life threatening infection that it was.
21. Judge Sean Lane ascribes complete and total immunity to AUSA Dana Walsh Kumar and AUST Gregory Zipes just like he thinks himself to be King George III, but neglects established case law that this immunity is only afforded if done within the course of their duties, is not shocking to the conscience, and is not otherwise outside the scope of their authority, such as criminal acts and tortious behavior.
22. The file is replete with documentary evidence of all of the above, and in fact these 2 are currently under multiple federal, state, and local criminal and intentional tort investigations as we speak, for example by the IRS, DOJ, OPR, FBI, and various OIGs of those entities.
23. And again, Judge Sean Lane completely forgives Trustees Marianne O'Toole and Salvatore Lamonica for breaking even his own judicial orders that Debtor first seek approval/communicate with them, before protecting his imminently destroyed interests when they do not return

his emails or phone calls on impending emergency court dates or stay violations that will occur within the next few days or hours, after they were given weeks, if not months, to intervene, interject, communicate with Debtor and/or the violator.

24. Judge Sean Lane's orders can be summarized as "do as I say, not as I do," and appear to be nothing but conspiratorial traps that he has engineered to find Debtor in violation of his verbal and written orders by allowing these "government employees" to commit "Serpico-like" behavior, doing nothing to protect Debtor and then sending him to a proverbial drug den to get shot in the face (legal by the way, according to U.S. Supreme Court Cases Warren v. District of Columbia, 444 A.2d. 1, D.C. Ct. of Ap. 1981 and Castle Rock v. Gonzales, 545 U.S. 748 (2005)).
25. And in contrast to Judge Sean Lane's erroneous statements that Walsh, Zipes, O'Toole, and Lamonica enjoy immunity for their behavior, it is well established that yes, there can be criminal liability for prosecutors, assistant U.S. attorneys, or bankruptcy trustees if they fail to take action to prevent violations of the automatic stay (9-2.000 - Authority Of The U.S. Attorney In Criminal Division Matters/Prior Approvals).
26. Prosecutors have a statutory duty to prosecute for all offenses against the United States, which includes the authority to act on violations.
27. Investigations into federal prosecutors have revealed instances of misconduct, indicating that they can be held accountable for failing to act (Prosecutorial Misconduct: Justice Denied as the System Turns a Blind Eye, Feb. 18, 2020 by Christopher Zoukis published in *Criminal Legal News* March, 2020, page 1 Filed under: Prosecutor/Attorney General Misconduct, Prosecutors.
28. Additionally, federal attorneys may face liability due to conflicts of interest or misuse of authority (Federal Attorneys, Federal Employee D e f e n s e S e r v i c e s , I n c <https://www.fedsprotection.com/Federal-Attorneys-Need-PLI>).
29. Thus, there are legal consequences for inaction in these roles.
30. With regard to Judge Sean Lane's overly simplistic dismissal of the Blockchain contempt motions, he fails to take into account that Debtor is forbidden and prohibited from litigating any matter which might be part of the bankruptcy estate, this according to Trustee Salvatore Lamonica.
31. In bankruptcy, a debtor is not allowed to litigate matters that are part of the bankruptcy estate.
32. This prohibition is in place to ensure that the bankruptcy process is

conducted fairly and that the court's authority is not undermined.

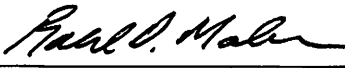
33. The debtor's ability to engage in litigation would complicate the bankruptcy proceedings and could lead to the court's decision being challenged.
34. Therefore, the debtor must adhere to the court's orders and avoid any actions that could interfere with the bankruptcy process (Taggart v. Lorenzen, 139 S. Ct. 1795 (2019)).
35. The ever contradictory Judge Sean Lane then goes on to state on page 13 of his "Memorandum and Order" dated May 12, 2025 that "an action against a third party is not subject to the automatic stay unless it is 'legally certain to impact estate property.'" Eletson Holdings, 731 F. Supp. 3d at 593 (quoting Picard v. Fairfield Greenwich Ltd., 762 F.3d 199, 208 (2d Cir. 2014)).
36. With regard to the AMGuard matter, once again Judge Sean Lane, either because of expediency, or plain dishonesty, completely neglects the fact that AMGuard, along with NYS DFS, denied claims by clients who were pre-petition former clients who elected to continue post-petition with Debtor, or signed new agreements, or Debtor was mandated to continue on with by third parties such as Judges or Arbitrators, and then lumped their combined legal fees into one fee dispute or credit card charge back, or dealt with Debtor pre-petition, but were not formally billed as such.
37. Furthermore Judge Lane ignores the *ex parte* conspiracies/communications by and between wilful violators, encouraging, counseling, and enabling them to violate the automatic stay.
38. Even further, in contrast to Judge Sean Lane's *diktat*, yes, encouraging, enabling, or assisting a creditor in violating an automatic bankruptcy stay under 111 U.S.C. § 362 can itself be a violation and may lead to contempt of court (In re Schwartz (1995), In re Jove Engineering, Inc. (1996), In re Knaus (2002), In re Campbell (2017)).
39. The automatic stay is a fundamental protection in bankruptcy law that halts collection efforts against a debtor once they file for bankruptcy.
40. Courts have held that willful violations of the automatic stay can result in sanctions, including actual and punitive damages.
41. Additionally, under 111 U.S.C. § 105, bankruptcy courts have the authority to issue contempt orders against parties who violate the stay.
42. If someone actively encourages or assists a creditor in violating the

stay, they could be held liable for contempt or other penalties.

43. Judge Sean Lane then obtusely and dishonestly states that "there is no evidence of such behavior" by AMGuard and NYS DFS and the violating former clients, so clearly either he, or his law clerks, refused to review or read the attached exhibits.
44. These people even cross-reference and name each other in their attacks and defensive reply affirmations, or cc parties that they should not be cc'ing as ex parte communications.
45. As indicated in this Notice of Stay Application and filed Notice of Appeal, none of Debtor's filings "abuse the process of the courts, with meritless, frivolous, vexatious, or repetitive filings."
46. Neither have any of Debtor's filings been "onerous, multiplicitous, or baseless litigation."
47. Similarly, none of Debtor's filings can be considered "vexation, harassment, or needless expense."
48. And as we have already indicated, each and every case citation that Judge Sean Lane uses to justify a "filing injunction for contempt or sanctions motions" are currently under appeal in the Southern District of New York case index no 25-CV-3935.
49. Ironically enough, Debtor always asked permission first, before filing contempt motions, to Judge Sean Lane's court and the Trustees, Assistant U.S. Attorneys, and even the wilful violators, but was roundly ignored by all of them, some at the written behest and encouragement of Judge Sean Lane himself.
50. Arrogant tyrannical Judge Sean Lane apparently believes that judges and government attorneys "are afforded immunity from suit for their official actions" even when they commit torts or crimes, completely ignoring the Federal Tort Claims Act ("FTCA") or established case law and statutory authority.
51. Judge Sean Lane then grieves for the wilful violators' being "saddled with needless expense and burden in defending against (Debtor's) many motions" but could not care less that it is the Debtor that truly needs to be protected by the court, not them, and has only been defending himself against their combined and coordinated lawfare onslaught.
52. Judge Sean Lane grieves for all of these wilful violators having to "hire counsel, file pleadings, and make appearances before the Court" while ignoring the emotional, psychological, physical, financial, familial, reputational, and logistical pain that his 2.5 year long delays/torture session have been inflicted on the Debtor.

53. And as we have already responded before in this court, all of Debtor's previous bankruptcy filings (discontinued, mistaken, erroneous or not) were prepared, counseled, and filed by previous bankruptcy lawyers such as Julio Portilla, without Debtor's input, opinion, or will, and should not be held against *pro se* Debtor herein.


Dated: May 25, 2025
New Rochelle, NY



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CERTIFICATE OF SERVICE

On May 25, 2025, I, Rahul Manchanda, served a copy of this **NOTICE OF STAY APPLICATION** and any attachments to the U.S. Bankruptcy Clerk and SDNY U.S. District Clerk at 300 Quarropas Street, White Plains NY 10606, and all relevant Appellees designated herein at their last known addresses on file, either via ECF and/or Electronic and/or U.S. Mail and/or Facsimile.



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